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SHA SO DAIN DAWELGONGSUN: RICHARD J MIGLIACCIO* YUAN ZHENG! *ADMITTED IN NY

OF COUNSEL RICHARD A ROTH PLLIOT L. LEWIS RALPH GERSTEIN PAUL H SCHIETROMA CHARLES HI RUBENSTEIN

November 23, 2007

Fia Facsimile (212) 805-7941

Hon Loretta A. Preska. 500 Pearl Street, Room 1320 New York, NY 10007

Hon, Kevin Nathamel Fox, Magistrate Judge 10 Foley Square New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DATE FILED:

Re: Plaintiff's Request for Extension of Time For Opposing Defendant's Motion to Dismiss Gimer Logistics Services Co., Ltd. v. ACH Freight Forwarding, Inc., et. al. 07 CIV 8677 (KNF)

Dear Judges:

We are counsel representing Ginter f ogistics Service Co., Ltd. ("Ginter") in the above-mentioned case, and we are writing to request Ten (10) additional days to file plaintiff's oppositions to the motion to dismiss filed by defendants ACH Freight Forwarding, Inc., ("ACH") and Jimin Zhou a/k/a Jimmy Zhou ("Zhou").

Defendants ACH and Zhou filed the motion to dismiss on or about November 5, 2007 yig CM/ECF system. Pursuant to the Court's Local Rule 6.1, we should file the opposition paper on or before November 16, 2007. We have come upon unexpected pressing matters in other cases that have diverted our attention from this response date. It is fully expected that plaintiff's opposition paper will be filed within ten days, on December 3, 2007. This extension of time will not prejudice defendants' interest in this case.

No prior request for extension of time is made. We have contacted Law Office of Bing 1.1, attorneys for defendants ACH and Zhou who has agreed not to oppose to this request of extension.

For the foregoing reasons, plaintiff requests until December 3, 2007 file its opposition to the motion to dismiss, and for all other just and appropriate relief.

Soordered November 27, 2007 Loretta a Presida. USDJ Very truly yours,

Dai & Associates, P.C.

Vera The

cc: Law Office of Bing Li, LLC, attorneys for defendant ACH and Zhou, by (917) 591-9292;

Kevin Kerveng Tung, P.C. attorneys for defendant Xiao Jie He d/b/a Pacific Jin An Irading, Inc. by (718) 939-4468;